ESTTA Tracking number:

ESTTA376507 11/02/2010

Filing date:

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91193064
Party	Plaintiff FN Herstal
Correspondence Address	BURTON S. EHRILICH LADAS & PARRY LLP 224 S MICHIGAN AVE STE 1600 CHICAGO, IL 60604 UNITED STATES burte@ladas.net
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Burton S. Ehrlich
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Date	11/02/2010
Attachments	p9.pdf (3 pages)(150570 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

FN HERSTAL)	Opposition	No.:	91193064
Opposer/Respondent)			
V.)			
SAEILO ENTERPRISES, INC.,)			
Applicant/Counterclaimant.)			

AGREED MOTION BY CONSENT FOR A THIRTY (30) DAY EXTENSION OF TIME FOR THE OPPOSER/RESPONDENT TO ANSWER OR OTHERWISE PLEAD IN RESPONSE TO THE COUNTERCLAIM FOR CANCELLATION

Now comes Opposer/Respondent, FN HERSTAL, by and through its attorneys Burton S. Ehrlich of Ladas & Parry LLP and herein requests a thirty (30) day extension of time for the Applicant to Answer or Otherwise Plead in response to the Counterclaim for cancellation. The Response to the Counterclaim for Cancellation would be due on November 2, 2010 and under this Motion would now become due on December 2, 2010. In support of this Motion, the Opposer/Respondent submits the following rationale:

The parties are in the process of discussing the potential settlement of the overall Opposition and Counterclaim cancellation proceedings. Also, the Counterclaim for cancellation involves certain historic events going back in time and the Opposer's counsel would need to further consult and review information for considering the preparation of a responsive document, should it become necessary to focus away from the settlement of this matter. It should also be noted that

counsel for the Opposer is representing a foreign based corporation and additional time would be necessary to consult with the foreign based principals and representatives for the corporation, with that entity not being fully versed on these types of U.S. proceedings. Additional time would be necessary to allow for such consultation and gathering of information, should settlement discussions not bring fruition.

Counsel for the Applicant/Counterclaimant Petitioner has consented to this extension.

Based upon the foregoing it is respectfully submitted that the Opposer/Respondent be permitted until and including <u>December</u>

2, 2010 in which to Answer or Otherwise Plead in response to the Cancellation Petition.

Respectfully submitted,

By:

One of Opposer's attorneys

Burton S. Ehrlich Ladas & Parry LLP 224 S. Michigan Avenue Suite 1600 Chicago, IL 60604 (312) 427-1300

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that this paper is being electronically filed with the United States Patent and Trademark Office on this 2nd day of November, 2010.

Burton S. Ehrlich

CERTIFICATE OF SERVICE

The undersigned, one of Opposer's attorneys, hereby certifies that on November 2, 2010, he caused a true and correct copies of the foregoing AGREED MOTION BY CONSENT FOR A THIRTY (30) DAY EXTENSION OF TIME FOR THE OPPOSER/RESPONDENT TO ANSWER OR OTHERWISE PLEAD IN RESPONSE TO THE COUNTERCLAIM FOR CANCELLATION to be served upon Applicant by First Class mail, postage pre-paid, at the following address:

Nancy Kennedy, Esq. Alix, Yale & Ristas, LLP 750 Main Street Hartford, CT 06103

Burton S. Ehrlich